

# EXHIBIT 37

# EXHIBIT 4

## (File Under Seal)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

-----x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

-----x

June 21, 2016  
9:17 a.m.

C O N F I D E N T I A L

Deposition of JOSEPH RECAREY, pursuant  
to notice, taken by Plaintiff, at the  
offices of Boies Schiller & Flexner, 401  
Las Olas Boulevard, Fort Lauderdale, Florida,  
before Kelli Ann Willis, a Registered  
Professional Reporter, Certified Realtime  
Reporter and Notary Public within and  
for the State of Florida.

1                   JOSEPH RECAREY - CONFIDENTIAL

2     Ghislane Maxwell?

3                 A.     I wanted to speak with everyone related to  
4     this home, including Ms. Maxwell. My contact was  
5     through Gus, Attorney Gus Fronstin, at the time, who  
6     initially had told me that he would make everyone  
7     available for an interview. And subsequent  
8     conversations later, no one was available for  
9     interview and everybody had an attorney, and I was  
10   not going to be able to speak with them.

11               Q.     Okay. During your investigation, what did  
12   you learn in terms of Ghislane Maxwell's  
13   involvement, if any?

14               MR. PAGLIUCA: Object to form and  
15   foundation.

16               THE WITNESS: Ms. Maxwell, during her  
17   research, was found to be Epstein's long-time  
18   friend. During the interviews, Ms. Maxwell was  
19   involved in seeking girls to perform massages  
20   and work at Epstein's home.

21               MR. PAGLIUCA: Object to form and  
22   foundation.

23   BY MR. EDWARDS:

24               Q.     Did you interview -- how many girls did  
25   you interview that were sought to give or that

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1                   JOSEPH RECAREY - CONFIDENTIAL

2   actually gave massages at Epstein's home?

3                   MR. PAGLIUCA: Object to form and  
4                   foundation.

5   BY MR. EDWARDS:

6                   Q.   Approximately.

7                   MR. PAGLIUCA: Same objection.

8                   THE WITNESS: I would say approximately  
9                   30; 30, 33.

10   BY MR. EDWARDS:

11                  Q.   And of the 30, 33 or so girls, how many  
12                 had massage experience?

13                  MR. PAGLIUCA: Object to form and  
14                 foundation.

15                  THE WITNESS: I believe two of them may  
16                 have been -- two of them.

17   BY MR. EDWARDS:

18                  Q.   Okay. And as we go through this report,  
19                 you may remember the names?

20                  A.   Correct. Let me correct myself. I  
21                 believe only one had.

22                  Q.   And was that -- was that one of similar  
23                 age to the other girls?

24                  MR. PAGLIUCA: Object to form and  
25                 foundation.

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2 THE WITNESS: No.

3 BY MR. EDWARDS:

4 Q. Okay. The one with massage experience was  
5 older?

6 MR. PAGLIUCA: Object to form and  
7 foundation.

8 THE WITNESS: Correct.

9 BY MR. EDWARDS:

10 Q. The remainder of the 30 girls that went to  
11 this house for the purposes of massage or recruited  
12 for massage, is it my understanding that they had no  
13 massage experience?

14 MR. PAGLIUCA: Object to form and  
15 foundation.

16 THE WITNESS: That's correct.

17 BY MR. EDWARDS:

18 Q. And were the majority of those girls that  
19 you interviewed over or under the age of 18?

20 MR. PAGLIUCA: Object to form and  
21 foundation.

22 THE WITNESS: The majority were under.

23 BY MR. EDWARDS:

24 Q. And how was it that Mr. Epstein gained  
25 access to that number of underaged girls?

1                   JOSEPH RECAREY - CONFIDENTIAL

2                   MR. PAGLIUCA: Object to form and  
3                   foundation.

4                   THE WITNESS: Each of the victims that  
5                   went to the home were asked to bring their  
6                   friends to the home. Some complied and some  
7                   didn't.

8                   BY MR. EDWARDS:

9                   Q. Okay. So the victim would come to the  
10                  home and could give a massage and get paid for it;  
11                  is that right?

12                  MR. PAGLIUCA: Object to form and  
13                  foundation.

14                  THE WITNESS: Correct.

15                  BY MR. EDWARDS:

16                  Q. And at the end of that massage, if that  
17                  victim brought other friends, she would get paid for  
18                  the recruitment of those friends?

19                  MR. PAGLIUCA: Object to form and  
20                  foundation.

21                  THE WITNESS: Correct.

22                  BY MR. EDWARDS:

23                  Q. Additionally, did your investigation  
24                  reveal that the assistants of Jeffrey Epstein would  
25                  call and set up for these girls to come over to the

1                   JOSEPH RECAREY - CONFIDENTIAL

2     house for the massages?

3                   MR. PAGLIUCA: Object to form and  
4     foundation.

5                   THE WITNESS: Correct.

6     BY MR. EDWARDS:

7                   Q. And, as well, certain people that were  
8     friends or girlfriends or assistants of Jeffrey  
9     Epstein would recruit girls under the pretense of  
10   giving a massage?

11                  MR. PAGLIUCA: Object to form and  
12   foundation.

13                  THE WITNESS: Correct.

14     BY MR. EDWARDS:

15                  Q. Is that what your investigation revealed  
16     in terms of the system of getting these girls over  
17     to the house?

18                  MR. PAGLIUCA: Object to form and  
19   foundation.

20                  THE WITNESS: Yes.

21     BY MR. EDWARDS:

22                  Q. Okay. Talking about the massages, when --  
23     when these -- the various girls that you interviewed  
24     described the massages, was there a pattern of what  
25     occurred during these massages?

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2 MR. PAGLIUCA: Object to form and  
3 foundation.

4 THE WITNESS: Yes, there was.

5 BY MR. EDWARDS:

6 Q. Okay. Describe for us what the pattern  
7 was that was told to you by the 30 or so girls that  
8 you interviewed?

9 MR. PAGLIUCA: Object to form and  
10 foundation.

11 THE WITNESS: Initially, when the -- when  
12 the victims would come into the home and were  
13 brought upstairs to provide the massage,  
14 Epstein would lay on his massage table, where  
15 they would start to rub his back and the back  
16 of his legs.

17 Epstein would either attempt to fondle the  
18 girls or touch the girls inappropriately, and  
19 at which point he would masturbate. And when  
20 he was done, he would get up and go wash off  
21 while the girls would get dressed and go back  
22 downstairs and get paid.

23 BY MR. EDWARDS:

24 Q. Okay. So did you determine that "massage"  
25 was actually a code word for something else?

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2                   MR. PAGLIUCA: Object to form and  
3                   foundation.

4                   THE WITNESS: When they went to perform a  
5                   massage, it was for sexual gratification.

6     BY MR. EDWARDS:

7                   Q. And when the assistants would call and ask  
8                   these girls to work, did you learn what the term  
9                   "work" meant with respect to these girls coming to  
10                  the house?

11                  MR. PAGLIUCA: Object to form and  
12                  foundation.

13                  THE WITNESS: "Work" meant to come and  
14                  provide Epstein a massage.

15     BY MR. EDWARDS:

16                  Q. And massage -- how often would these  
17                  massages, based upon your investigation, turn into  
18                  something sexual?

19                  MR. PAGLIUCA: Object to form and  
20                  foundation.

21                  THE WITNESS: During the investigation, it  
22                  was determined that he would have multiple  
23                  massages during the day. He would have some in  
24                  the morning and some in the afternoon,  
25                  sometimes into the evening. So he would

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2     BY MR. EDWARDS:

3               Q.    All right.

4               And so when you went to speak with the  
5     victims, what did these victims say about their  
6     experience with Jeffrey Epstein?

7               MR. PAGLIUCA: Object to form and  
8     foundation.

9               THE WITNESS: Once they were recruited,  
10    they were brought to the home. They were to  
11    provide a massage.

12              Some of the victims did not want to be  
13    touched; some of the victims did not want to  
14    partake in that. So it was -- I believe for --  
15    for a couple of them it was only a one-shot  
16    deal, but others continued to come.

17     BY MR. EDWARDS:

18              Q.    Okay. And as you interviewed some of  
19    those victims, did you learn that some of those  
20    victims also brought additional girls?

21              MR. PAGLIUCA: Object to form and  
22    foundation.

23              THE WITNESS: That's correct.

24     BY MR. EDWARDS:

25              Q.    So as you were investigating this case, as

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2 part of your investigation, you're learning  
3 information from these victims and then going to  
4 talk to the next person down the line, if you will?

5                   MR. PAGLIUCA: Object to form and  
6 foundation.

7                   THE WITNESS: Correct.

8 BY MR. EDWARDS:

9                   Q. And what is the purpose of that?  
10                  A. To identify further victims and acquire  
11 additional information.

12                  Q. And in doing that, were you able to  
13 corroborate the accuracy of what the first victim  
14 told you?

15                  MR. PAGLIUCA: Object to form and  
16 foundation.

17                  THE WITNESS: Correct.

18 BY MR. EDWARDS:

19                  Q. Okay. And did you learn of [REDACTED]  
20 involvement with respect to the various girls?

21                  MR. PAGLIUCA: Object to form and  
22 foundation.

23                  THE WITNESS: Yes.

24 BY MR. EDWARDS:

25                  Q. What was her role?

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2                   MR. PAGLIUCA: Object to form and  
3                   foundation.

4                   THE WITNESS: That is correct.

5     BY MR. EDWARDS:

6                   Q. And did you turn all of your files over to  
7                   either the State Attorney's Office or the FBI?

8                   A. That is correct.

9                   Q. And through the State Attorney's Office,  
10                  was the information contained within the probable  
11                  cause affidavit and the incident reports a publicly  
12                  available document?

13                  MR. PAGLIUCA: Object to form and  
14                  foundation.

15                  THE WITNESS: Yes.

16     BY MR. EDWARDS:

17                  Q. And around the time of your  
18                  investigation -- around the time you ended your  
19                  investigation and thereafter, were various newspaper  
20                  articles written about the substance of some of your  
21                  investigation?

22                  A. Yes.

23                  Q. Did it become well known to the public  
24                  that Jeffrey Epstein had recruited high school girls  
25                  to his house for the purpose of some sexually

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2 involved massage?

3                   MR. PAGLIUCA: Object to form and  
4 foundation.

5                   THE WITNESS: That is correct.

6 BY MR. EDWARDS:

7                   Q. And, in fact, haven't you read many of  
8 these newspaper articles?

9                   A. That is correct.

10                  Q. That was not a hidden secret from the  
11 public beginning in 2006, right?

12                  A. No.

13                  Q. And from your overall investigation, kind  
14 of just a big picture, what was the criminal  
15 activity, as specific as you can, that you learned  
16 that Jeffrey Epstein and others were involved in?

17                  MR. PAGLIUCA: Object to form and  
18 foundation.

19                  THE WITNESS: It was sexual battery and  
20 lewd and lascivious conduct for under the age  
21 of 16.

22 BY MR. EDWARDS:

23                  Q. And what was the specific system of  
24 engaging in this type of activity?

25                  MR. PAGLIUCA: Object to form and

1                   JOSEPH RECAREY - CONFIDENTIAL

2                   foundation.

3                   THE WITNESS: As to --

4     BY MR. EDWARDS:

5                   Q. From the recruitment to the: How did you  
6     get them, what did you do, how did you keep it  
7     going?

8                   A. Once the --

9                   MR. PAGLIUCA: Object to form and  
10                  foundation. Sorry.

11                  THE WITNESS: No, no.

12                  As it became known to us that the victim  
13     was recruited, brought to the home, provided  
14     the massage, was paid, whether there was  
15     inappropriate touching, whether there was  
16     sexual activity, whether there was actually  
17     intercourse, all of that was documented and was  
18     asked whether they brought anyone to the home,  
19     whether they had any formal training in massage  
20     therapy, and once -- once additional victims  
21     were identified, we continued the same -- the  
22     same method of investigation.

23     BY MR. EDWARDS:

24                  Q. Okay. And one of the earliest victims, in  
25     terms of the chronology of this pyramid of girls,

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2   for lack a better word -- you understand what I mean  
3   by that, right?

4                   MR. PAGLIUCA: Object to form and  
5                   foundation.

6                   THE WITNESS: Yes.

7   BY MR. EDWARDS:

8                   Q. That there's -- there's -- one of the  
9   earliest victims that you interviewed was [REDACTED]  
10   [REDACTED]; is that right?

11                  MR. PAGLIUCA: Object to form and  
12                  foundation.

13                  THE WITNESS: It was actually [REDACTED], I think  
14                  was the first one that was interviewed, and  
15                  then [REDACTED] was the one I interviewed.

16   BY MR. EDWARDS:

17                  Q. Okay. My question was bad.

18                  I know that the first person interviewed  
19                  that kind of kicked off the investigation was [REDACTED],  
20                  but -- and just to create a picture of what we have  
21                  here, this is, and tell me if I characterized it  
22                  wrong, a scheme that Jeffrey Epstein engaged in by  
23                  using assistants to recruit girls, right?

24                  A. Correct.

25                  Q. Under the --

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2                   MR. PAGLIUCA: Object to form and  
3                   foundation.

4     BY MR. EDWARDS:

5                   Q. Under the pretense of giving a massage?

6                   MR. PAGLIUCA: Object to form and  
7                   foundation.

8                   THE WITNESS: Correct. Either a message  
9                   and/or become a model for Victoria's Secrets  
10                  and/or connections.

11    BY MR. EDWARDS:

12                  Q. And when he was able to get these girls to  
13                  his home, he would then offer them money to also  
14                  become recruiters for him?

15                  MR. PAGLIUCA: Object to form and  
16                  foundation.

17                  THE WITNESS: Correct.

18    BY MR. EDWARDS:

19                  Q. And that created this -- if you've mapped  
20                  it out, kind of a spider web or a pyramid of girls  
21                  bringing girls to Jeffrey Epstein's house?

22                  MR. PAGLIUCA: Object to form and  
23                  foundation.

24    BY MR. EDWARDS:

25                  Q. Right?

1                   JOSEPH RECAREY - CONFIDENTIAL

2                 A.    Correct.

3                 Q.    All right.

4                   So when I say one of the first, I mean on  
5   the top of the pyramid one of the earliest people  
6   that you interviewed that brought girls to Jeffrey  
7   Epstein's house was [REDACTED]?

8                 A.    Correct.

9                   MR. PAGLIUCA: Object to form and  
10                  foundation.

11                 BY MR. EDWARDS:

12                 Q.    And I think that you testified that [REDACTED]  
[REDACTED] to Jeffrey Epstein's house the  
14                  first time, right?

15                   MR. PAGLIUCA: Object to form and  
16                  foundation.

17                 THE WITNESS: Correct.

18                 BY MR. EDWARDS:

19                 Q.    Did you ever trace all the way up to the  
20                  highest level to determine who was it that started  
21                  this particular chain of Palm Beach girls coming  
22                  over to Jeffrey Epstein's home?

23                   MR. PAGLIUCA: Object to form and  
24                  foundation.

25                 THE WITNESS: I did not. Basically, when

2 AFFIDAVIT

3 STATE OF FLORIDA )  
COUNTY OF )

4

5

I, , being first  
duly sworn, do hereby acknowledge that I did  
read a true and certified copy of my deposition  
which was taken in the case of GIUFFRE V.  
MAXWELL, taken on the 24th day of September,  
2016, and the corrections I desire to make are  
as indicated on the attached Errata Sheet.

9

10 CERTIFICATE

11

12 STATE OF FLORIDA )  
COUNTY OF )

13

14

Before me personally appeared

15

16 to me well known / known to me to be the  
person described in and who executed the  
foregoing instrument and acknowledged to and  
17 before me that he executed the said instrument  
in the capacity and for the purpose therein  
18 expressed.

19

20 Witness my hand and official seal, this  
day of , .

21

22

23

(Notary Public)

24

25

## 25 My Commission Expires: